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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
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| | | |
|------------------------------|---|---------------------------|
| 13 UNITED STATES OF AMERICA, |) | No. CR 19-00159 EJD |
| |) | |
| 14 Plaintiff, |) | OPPOSITION TO REQUEST FOR |
| |) | INTERNATIONAL TRAVEL |
| 15 v. |) | |
| |) | |
| 16 REYES DANIEL RUIZ, |) | |
| |) | |
| 17 Defendant. |) | |
| |) | |

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19 The United States Attorney's Office respectfully opposes Mr. Reyes Ruiz's request to travel
20 from the United States to Mexico on July 19, 2019, and to stay in Mexico until August 5, 2019.

21 This Court has discretionary authority to modify Mr. Ruiz's conditions of release under 18
22 U.S.C. § 3142(c)(3).

23 As a condition of his pretrial release, Mr. Ruiz's travel is limited to the Northern and Eastern
24 Districts of California. His release is subject to a \$200,000 unsecured bond. Docket 9. No third party
25 surety or custodian is a signatory to the bond.

26 International travel increases the risk of flight. Ruiz has substantial family ties to Mexico. It
27 limits the government's ability to supervise him from abroad. The State Department is not in the

1 business of supervising persons abroad subject to pretrial supervision. His presence abroad
2 unnecessarily complicates the government's ability to move forward with its case in the event of his
3 failure to return to the United States. The government is unaware of any exceptional circumstances to
4 justify the international travel at this time.

5 His conditions of release should not be modified to permit international travel of any sort.

6 The defense noticed this hearing for July 11, 2019. Based on the defense filing, the government
7 waives its right to a hearing, and agrees to submit to the Court's consideration of this matter on the
8 papers.

9 DATED: July 8, 2019

Respectfully submitted,

10 DAVID L. ANDERSON
11 United States Attorney

12 /s/
13 DANIEL KALEBA
14 Assistant United States Attorney